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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JAVIER CATALAN BAHENA,
ERASMO MARTINEZ,
ALVARO MARTINEZ,
FILIBERTO TAPIA OCAMPO, and
OSCAR MARTINEZ,

Defendants.

FIRST BILL OF PARTICULARS
FOR FORFEITURE

Case No. 2:23-cr-00163 TC

Senior Judge Tena Campbell

On April 26, 2023, the United States filed Indictment that gave notice of the government's intent to forfeit property under 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c). Dkt. 14.

The United States now gives notice that it is seeking to forfeit the following property pursuant to the same forfeiture authorities listed in the Indictment's forfeiture notice:

- Zastava Arms Z-PAP M70 rifle, serial no. Z70-123897
- Tisas 1911 A1 pistol, serial no. T0620-21K05181
- Omega AR12 shotgun, serial no. 538-H22YD-30
- Walther Hammerli TAC RI .22 rifle, serial no. HA019196
- Smith & Wesson 1000 shotgun, serial no. FS63634
- Beretta 92D Centurion pistol, serial no. BER254535Z
- Silver Eagle Tac Pro 12-gauge shotgun, serial no. 45-H21 YD-1729
- Beretta M9 pistol, serial no. BM051751

- Walther Colt Government pistol, serial no. WD081754
- Beretta 92FS pistol, serial no. BM052820
- Walther Colt Government pistol, serial no. WD076291
- Beretta M9 pistol, serial no. BM062991
- Beretta M9 pistol, serial no. BM062995
- Beretta M9 pistol, serial no. BM062996
- Beretta M9 pistol, serial no. BM063000
- Walther Colt Government pistol, serial no. WD085002
- Walther Colt Government pistol, serial no. WD085003
- Smith & Wesson M&P 15-22 rifle, serial no. LBF4611
- Ruger 10/22 .22 rifle, serial no. 117-36175
- Ruger 10/22 .22 rifle, serial no. 0023-00886
- Ruger 10/22 .22 rifle, serial no. 0022-19210
- Ruger 10/22 .22 rifle, serial no. 0021-33850
- Ruger 10/22 .22 rifle, serial no. 0021-77088
- Ruger 10/22 .22 rifle, serial no. 0023-03757
- Escort Shotgun, serial no. 912063
- Ruger 10/22 .22 rifle, serial no. 0021-34008
- Beretta 92FSR pistol, serial no. BM066956
- Beretta 92FS pistol, serial no. BER818707
- Ruger 10/22 .22 rifle, serial no. 0022-56858
- One (1) Norinco, Caliber: .762, Model: 156S-1, SN: 509761 Rifle
- One (1) Remington, Caliber: 12, Model: 870, SN: T739383V Shotgun
- One (1) Ruger, Caliber: .22, Model: 10/22, SN: 0017-45249 Rifle
- One (1) Remington, Caliber: 12, Model: 870, SN: V021313V Shotgun
- One (1) Norinco, Caliber: .762, Model: 56S, SN: 609226 Rifle
- One (1) Norinco, Caliber: .762, Model: 56S, SN: 611678 Rifle
- One (1) Colt, Caliber: .38, Model: Super 38 Automatic, SN: 9149
- Eighteen (18) assorted 9mm ammunition.
- Fifty-Five (55) assorted, multi-caliber ammunition.
- Fifteen (15) assorted, 12-caliber ammunition.
- One (1) Colt, Caliber: .380, Model: Mustang Pocketlite, SN: PL27597
- One (1) Browning, Caliber: .380, Model: BDA380, SN: 425PP06321
- One (1) Browning BDA-380 Pistol
- Three Hundred and Eighty-Five (385) assorted, multi-caliber ammunition.
- Four Hundred and Fifty-One (451) assorted, multi-caliber ammunition.
- One (1) Browning, Caliber: .300, Model: Safari, SN: 100A173927
- Three (3) Federal, Caliber: 300 ammunition
- One (1) Browning, Caliber: 300, Model: Medallion, SN: 01546ZX354

- One (1) Remington, Caliber: 12, Model: 870, SN: RS71205Y
- Twenty-Nine (29) assorted, multi-caliber ammunition
- Two (2) magazines.
- Thirteen (13) assorted, multi-caliber ammunition.
- Fifty (50) Aguila, 9mm ammunition.
- One Hundred (100) Magtech, Caliber: .45 ammunition.
- Fifty-Four (54) assorted, multi-caliber ammunition.
- Ten (10) Caliber, .762 ammunition.
- One Hundred (100) assorted, Caliber: .762 ammunition.
- Five (5) AK style rifle magazines
- Smith and Wesson, model M&P -15, .556 caliber, rifle, serial# TM32016.
- Ruger, model 10/22, .22 caliber, rifle, serial# 0021-42493 with magazine.
- Ruger, model 10/22, .22 caliber, rifle, serial# 0017-99587 with scope.
- 58 rounds of assorted .380 caliber ammunition with .380 magazine.
- 25 rounds of assorted .223/300 WSM ammunition.
- 25 rounds of assorted ammunition.
- 73 rounds of assorted 12 gauge and .22 caliber ammunition.
- Approximately 250 rounds of .22 caliber ammunition
- U.S Currency \$10,180
- U.S Currency \$2,000
- U.S Currency \$10,035
- U.S Currency \$3,800
- U.S Currency \$1,813
- Two (2) Super 38 shell casings.
- One (1) 7X64 magazine
- A Beretta M9 lower with (2) 9mm magazines
- AR-15 style components (forward grips and pistol grips)
- One (1) Ruger 10/22 Serial # 0016-52973
- AR500 Armor carrier and (2) AR500 BP-500 Armor Plates
- All other associated ammunition

Respectfully submitted this 7th day of July, 2023.

TRINA A. HIGGINS
United States Attorney

/s/ Travis K. Elder

Travis K. Elder
Assistant U.S. Attorney